

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANA MICHIGAN POWER )  
COMPANY, AN INDIANA CORPORATION, FOR (1) )  
AUTHORITY TO INCREASE ITS RATES AND )  
CHARGES FOR ELECTRIC UTILITY SERVICE )  
THROUGH A PHASE IN RATE ADJUSTMENT; (2) )  
APPROVAL OF: REVISED DEPRECIATION RATES; )  
ACCOUNTING RELIEF; INCLUSION IN BASIC RATES )  
AND CHARGES OF QUALIFIED POLLUTION )  
CONTROL PROPERTY, CLEAN ENERGY PROJECTS ) CAUSE NO. 44967  
AND COST OF BRINGING I&M'S SYSTEM TO ITS )  
PRESENT STATE OF EFFICIENCY; RATE )  
ADJUSTMENT MECHANISM PROPOSALS; COST )  
DEFERRALS; MAJOR STORM DAMAGE )  
RESTORATION RESERVE AND DISTRIBUTION )  
VEGETATION MANAGEMENT PROGRAM RESERVE; )  
AND AMORTIZATIONS; AND (3) FOR APPROVAL OF )  
NEW SCHEDULES OF RATES, RULES AND )  
REGULATIONS

**I&M INDUSTRIAL GROUP'S NOTICE OF WITHDRAWAL OF ITS REQUEST FOR  
CONFIDENTIAL TREATMENT OF CERTAIN WORKPAPERS OF MICHAEL P.  
GORMAN, SUBMISSION OF REVISED EXHIBIT A TO ITS MOTION FOR  
CONFIDENTIAL TREATMENT AND SUBMISSION OF WORKPAPERS**

The I&M Industrial Group ("Industrial Group"), by counsel, respectfully gives notice of the withdrawal of its request for confidential treatment of certain workpapers supporting the testimony of Michael P. Gorman, and hereby submits those workpapers to the Commission together with a revised Exhibit A to its November 9, 2017 Motion for Confidential Treatment. In support of this notice, the Industrial Group states as follows:

1. On November 7, 2017, pursuant to the procedural schedule established by Docket Entry dated September 5, 2017, the Industrial Group filed its case-in-chief, including the direct testimony and exhibits of Michael P. Gorman.

2. On November 9, 2017, again pursuant to the procedural schedule, the Industrial Group submitted its workpapers, including those supporting Mr. Gorman's testimony and exhibits.
3. Concurrent with the submission of its workpapers, the Industrial Group filed a motion requesting that the Commission issue an order finding twenty-seven (27) of Mr. Gorman's workpapers to be confidential and instituting safeguards for their handling and treatment, including protecting them from public disclosure. Those twenty-seven (27) workpapers were identified on Exhibit A to the Industrial Group's Motion, and the request was supported by the affidavit of Mr. Gorman, attached as Exhibit B to the Motion.
4. It has since come to the attention of Mr. Gorman and the Industrial Group that four (4) of the workpapers, specifically those identified as MPG Confidential Workpapers 24, 25, 26, and 27 can be found disseminated online without obvious protections.
5. Given the dissemination of the material comprising those workpapers, including their submission in other jurisdictions without confidential protection, the Industrial Group hereby notifies the Commission and Parties it is withdrawing its request for confidential treatment of those workpapers previously identified as MPG Confidential Workpapers 24, 25, 26, and 27.
6. The Industrial Group is continuing to seek confidential treatment for the remaining workpapers identified on Exhibit A to its November 9, 2017 Motion, and submits a Revised Exhibit A to that Motion herewith.
7. The Industrial Group is also submitting public versions of what had previously designated as MPG Confidential Workpapers 24, 25, 26, and 27 with this filing. Those workpapers are now designated MPG Workpapers 17, 18, 19, and 20. Counsel for the Industrial Group further states that it has previously provided copies of the confidential workpapers to all parties with which it

has a confidentiality/non-disclosure agreement in place. The Industrial Group will provide the workpapers to those parties who have not already received a copy.

WHEREFORE, the I&M Industrial Group, hereby withdraws its request for confidential treatment of MPG Confidential Workpapers 24, 25, 26, and 27 and submits those workpapers as MPG Workpapers 17, 18, 19, and 20. The Industrial Group is providing a Revised Exhibit A to its November 9, 2017 Motion seeking confidential treatment of Mr. Gorman's workpapers and reiterates its request that the Commission issue an order finding MPG Confidential Workpapers MPG 1-23 to be confidential and instituting safeguards for their handling as set forth in its November 9<sup>th</sup> Motion.

Respectfully submitted,

LEWIS KAPPES, P.C.

/s/ Joseph P. Rompala

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing document was served via electronic mail, this 27<sup>th</sup> day of November, 2017, upon the following:

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/s/ Joseph P. Rompala

Joseph P. Rompala

# Indiana Michigan Power Company

## Docket No. 44967

### Confidential Workpaper Index

(Supporting the direct testimony and attachments of Michael P. Gorman on behalf of the Indiana Michigan Industrial Group.)

<u>Workpaper</u>	<u>Description</u>
MPG Confidential WP 1.pdf	<i>AUS Utility Reports</i> , various publication dates.
MPG Confidential WP 2.pdf	<i>Blue Chip Financial Forecasts</i> , December 1, 2013 - October 1, 2017.
MPG Confidential WP 3.pdf	<i>Blue Chip Economic Indicators</i> , October 10, 2017.
MPG Confidential WP 4.xlsx	Blue Chip Projected Federal Funds Rate, 30 yr Treasury Bond Yields, and GDP Price Index workpaper.
MPG Confidential WP 5.pdf	<i>Duff &amp; Phelps, 2017 SBBi Yearbook</i> .
MPG Confidential WP 6.pdf	<i>Duff &amp; Phelps, 2017 Valuation Handbook: Guide to Cost of Capital</i> .
MPG Confidential WP 7.pdf	<i>Morningstar, Inc., Ibbotson SBBi 2013 Valuation Yearbook</i> .
MPG Confidential WP 8.xlsx	GDP Forecast data, multiple sources.
MPG Confidential WP 9.pdf	<i>Mergent Bond Record</i> April 2004, February 2006, September 2010 and <i>Mergent Public Utility Manual</i> , 2003.
MPG Confidential WP 10.pdf	<i>Regulatory Research Associates</i> , Major Rate Case Decisions, multiple publication dates Jan.1997, Jan. 2011, and July 26, 2017.
MPG Confidential WP 11.xlsx	SNL Index Comparison data.
MPG Confidential WP 12.xlsx	SNL growth rates.
MPG Confidential WP 13.pdf	<i>Moody's Investor Service</i> : "Regulated Utilities - US: 2017 Outlook - Timely Cost-Recovery Drives Stable Outlook," November 4, 2016.
MPG Confidential WP 14.pdf	<i>Moody's Investor Service</i> : "US Regulated Utilities: Lower Authorized Equity Returns will Not Hurt Near-Term Credit Profiles," March 10, 2015.
MPG Confidential WP 15.pdf	<i>Moody's Investor Service</i> : "Rating Action: Moody's affirms Indiana Michigan Power at Baa1; assigns short-term rating of P-2; revises outlook to positive," March 1, 2017.
MPG Confidential WP 16.xlsx	Utility Capital Expenditures.
MPG Confidential WP 17.pdf	S&P Global Market intelligence, RRA Financial Focus: "Capital Expenditure Update," October 23, 2017.
MPG Confidential WP 18.pdf	<i>Standard &amp; Poor's Global Ratings</i> : "Industry Top Trends 2017, Utilities," February 16, 2017.
MPG Confidential WP 19.pdf	<i>Standard &amp; Poor's Ratings Services</i> : "Corporate Industry Credit Research: Industry Top Trends 2016, Utilities," December 9, 2015.
MPG Confidential WP 20.pdf	<i>Standard &amp; Poor's RatingsDirect</i> : "Criteria Methodology: Business Risk/Financial Risk Matrix Expanded," May 27, 2009.
MPG Confidential WP 21.pdf	<i>Standard &amp; Poor's RatingsDirect</i> : "Criteria: Corporate Methodology," November 19, 2013.
MPG Confidential WP 22.PDF	<i>Standard &amp; Poor's RatingsDirect</i> : "American Electric Power Co. Inc. And Subsidiaries Upgraded To 'A-', Off Watch; Outlook Stable" February 2, 2017.
MPG Confidential WP 23.pdf	<i>The Value Line Investment Survey</i> , July 28, August 18, September 1, and September 15, 2017.